

Exhibit C to Ferber Declaration  
Part 1

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 ANTONNE M. JONES, )

5 Plaintiff, )

6 -against- )

7 ROC-A-FELLA FILMS, INC., )  
8 LION'S GATE FILMS, INC., DAMON )  
9 DASH and SHAWN CARTER, )

10 Defendants. )

) Index No.  
) 07 CV 3648

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12  
13  
14  
15  
16 DEPOSITION OF ANTONNE M. JONES  
17 New York, New York  
18 December 20, 2007  
19  
20  
21  
22  
23

24 Reported by:  
25 Judi Johnson, RPR, CLR  
Job No.: 14542

 COPY

1 ANTONNE M. JONES

2 A AntonneJ@AOL.

3 Q Anything else?

4 A Those are my personal E-mails.

5 Q Do you have a business E-mail?

6 A Yes. Clearvision.

7 Q One word?

8 A Yes. Pub at AOL.

9 Q Any other business E-mails?

10 A No.

11 Q If you could please describe your  
12 educational experience starting with high  
13 school.

14 A Graduated.

15 Q And what high school?

16 A I attended Roman Catholic High and  
17 graduated at Delaware Valley High School.

18 Q Where is Roman Catholic High School  
19 located?

20 A Philadelphia.

21 Q Do you remember the street?

22 A Yes. Broad and Vine.

23 Q Where is Delaware Valley High School?

24 A Also in Philadelphia.

25 Q Do you recall the street?

1 ANTONNE M. JONES

2 Q Who is the first person that you  
3 remember showing a copy of The Family to?

4 MR. DUNLOP: Objection as to form.  
5 You can answer.

6 A My mother.

7 Q What's your mother's name?

8 A Mardrina, M-A-R-D-R-I-N-A, Jones.

9 Q Do you recall when that was?

10 A No, I don't recall.

11 Q Did you give her a copy of The Family?

12 A A copy of --

13 Q The Family when she first looked at  
14 it?

15 A I don't recall if I gave her a copy  
16 for her own personal -- but I gave it to her to  
17 read.

18 Q Who is the next person that you recall  
19 showing The Family to?

20 A Mr. Dash.

21 Q When was that?

22 A It was the summer of 1998.

23 Q Do you recall what month?

24 A I remember the summer of '98.

25 Q And what about after that?

1 ANTONNE M. JONES

2 A After that what?

3 Q Who is the next person you recall  
4 giving a copy of The Family to or letting them  
5 read it?

6 A I can't recall offhand.

7 Q Can you recall any other person that  
8 you gave a copy of The Family to or allowed them  
9 to read it before it was released?

10 A It's been -- I can't recall exactly  
11 who prior to release right now.

12 Q Do you recall whether anybody was  
13 given The Family by you other than your mother  
14 and Mr. Dash before it was released?

15 A I can't recall at this time.

16 Q As we're sitting here today, you don't  
17 remember giving it to anybody to read or review  
18 other than your mother or Mr. Dash before August  
19 of 1999?

20 A I don't recall at this time. I don't  
21 recall.

22 MR. TAMOSHUNAS: Mark this.

23 (Whereupon, Copy of the book with  
24 copyright certification was marked as  
25 Defendant's Exhibit 6 for identification, as

1 ANTONNE M. JONES

2 Mr. Anderson wanted to meet you?

3 A That I'm not sure about, what  
4 Mr. Wongus told Mr. Anderson.

5 Q What did he tell you?

6 A Well, he gave me Mr. Anderson's phone  
7 number; and from that point, on me and  
8 Mr. Anderson spoke.

9 Q When was that conversation?

10 A I don't remember the exact date.

11 Q What was the substance of that  
12 conversation?

13 A Okay. The substance of the  
14 conversation was -- let me just go say also that  
15 I spoke with Mr. Anderson after it was filed.  
16 After it was filed, the complaint was filed.

17 Q And what was the substance of your  
18 first conversation with him?

19 A Well, the substance of the  
20 conversation, he was kind of like venting.

21 Q What did he say.

22 A He was talking about his situation as  
23 far as with State Property and him not being  
24 sufficiently, adequately paid, right.

25 Q Paid by who?

1 ANTONNE M. JONES

2 A From my recollection, he specifically  
3 mentioned Mr. Dash.

4 Q What else did Mr. Anderson stay?

5 A The conversation was basically about  
6 that and also about him not getting paid, being  
7 short-changed from the initial sale and not  
8 being involved in the second movie, State  
9 Property II, and also and also not getting  
10 rights or merchandising rights, to the best of  
11 my recollection.

12 Q What else did he say?

13 A He detailed how he had tried to hunt  
14 Mr. Dash down and make amends and get his money  
15 and he's been unsuccessful.

16 Q What else was said during the  
17 conversation?

18 A He also mentioned how he had contacted  
19 another gentleman by the name of Shug Knight to  
20 have him contact Mr. Dash to get his money, and  
21 he mentioned again how he was unsuccessful.

22 Q What else was said during this  
23 conversation?

24 A He quoted that Mr. Dash told him that  
25 he saw him in the Beverly Hills Hotel, and

1 ANTONNE M. JONES

2 Mr. Dash told him -- this is a quote from him,  
3 he'll have to chase him for his money because he  
4 called Mr. Knight.

5 Q What else was said during this  
6 conversation?

7 A And also I told him about my lawsuit  
8 that was filed also.

9 Q What did Mr. Anderson say about that?

10 A Well, he didn't really elaborate too  
11 much about that.

12 Q Do you remember anything he said about  
13 the lawsuit?

14 A Not specifically about the lawsuit. I  
15 do remember him telling me at the meeting -- a  
16 conversation he had with Mr. Dash.

17 Q What did he say about that  
18 conversation?

19 A The conversation that Mr. Dash asked  
20 him did he know myself -- asked him did he know  
21 me. That's all he said.

22 Q Dash asked Mr. Anderson if  
23 Mr. Anderson knew you?

24 A Yes.

25 Q And what did he say?



1 ANTONNE M. JONES

2 A Anderson told him that he didn't know  
3 me. That's what he told Mr. Dash.

4 Q What else did you two discuss during  
5 that call?

6 A That's all I can remember at this  
7 moment.

8 Q Did Mr. Anderson say anything about  
9 having written State Property?

10 A Yes. He did mention about State  
11 Property in terms of -- in regards to writing.  
12 He also mentioned how he was upset because  
13 another gentleman had got writing credits to  
14 State Property also.

15 Q And what did he say about the lawsuit?

16 A He didn't really say too much about  
17 it.

18 Q Was he familiar with the lawsuit when  
19 you spoke to him?

20 A I don't recall if he was or not,  
21 because I don't remember him mentioning -- I'm  
22 not really sure at this moment. I'm not sure.

23 Q How long was this conversation with  
24 Mr. Anderson?

25 A I was at his house approximately about

1 ANTONNE M. JONES

2 30 to 45 minutes.

3 Q Did you have any phone conversations  
4 prior to this meeting?

5 A With Anderson?

6 Q Yes.

7 A Yes.

8 Q What was discussed during that call?

9 A Well, during that call, he gave me his  
10 address.

11 Q So it was a short call, just setting  
12 up the meeting?

13 A Yes.

14 Q Did you discuss anything of substance  
15 on the phone call?

16 A Not that I can remember.

17 Q What else was discussed at your  
18 meeting with Mr. Anderson?

19 A I can't really recall at this moment.

20 Q Did you talk about any potential  
21 business opportunities?

22 A I can't recall. I don't think so.  
23 No, no. We didn't have a conversation about  
24 business opportunities.

25 Q Did you talk about your book, The

1 ANTONNE M. JONES

2 Family?

3 A I don't recall. I don't recall at  
4 this moment.

5 Q Do you recall anything else about your  
6 conversation with Mr. Anderson?

7 A At this moment, I don't recall.

8 Can we take a short break, please?

9 Q Certainly.

10 (Whereupon, a break was taken.)

11 MR. TAMOSHUNAS: What was the last  
12 question of and answer?

13 (Whereupon, the referred to portion  
14 was read back by the court reporter.)

15 BY MR. TAMOSHUNAS:

16 Q Mr. Jones, the entire conversation  
17 that you were talking about with Mr. Anderson,  
18 that took place at his house, correct?

19 A At his home, yes.

20 Q And what else did Mr. Anderson say  
21 about writing State Property?

22 A Well, that's all -- I don't remember  
23 anything else at this moment, what else he  
24 mentioned about State Property. But I also  
25 remember -- I want to add. I also remember him

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mentioning when Mr. Dash asked him did he know me, that Damon, Mr. Dash showed him -- gave him -- showed him a copy of the book and gave it to him.

Q What did Mr. Anderson say about that?

A He didn't embellish anything about that.

Q Did you two talk about your book, The Family, at all?

A Not in detail. He told me -- not in detail.

Q What was discussed about your book, The Family?

A He just told me that he heard about it. There was nothing in the creative content. It was just that he heard about it.

Q What did he say about having heard about your book?

A Well, that was pretty much it.

Q He had heard about it from who?

A Well, he didn't say other than the fact that -- other than that Mr. Dash gave it to him during the first -- when he was talking -- when Mr. Dash asked if he knows me, I don't

1 ANTONNE M. JONES

2 know, he didn't tell me who else told him other  
3 than him.

4 Q Did you two discuss the claims made in  
5 the complaint that State Property is based on  
6 your book, The Family?

7 A No.

8 Q When you had this conversation with  
9 Mr. Anderson, was he aware of the claims that  
10 you were making that your work was the basis of  
11 State Property?

12 A I believe he does. To the best of my  
13 knowledge, I believe he did, yes.

14 Q And why do you think that?

15 A Because he -- because I told him  
16 about -- I knew -- he knew about the complaint.

17 Q How did he know about the complaint?

18 A That, I'm not really sure at this  
19 moment.

20 Q What did he say about the complaint  
21 during this meeting?

22 A Well, again, there was -- well, he  
23 didn't really elaborate too much on my  
24 complaint. It was more about his situation with  
25 Mr. Dash.

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Q Did he say anything about the complaint?

A No, not to my recollection, he didn't.

Q Did he say anything regarding the claims that you were making that it was your book that served as a basis for State Property?

A Not to my recollection at this moment.

Q Is there anything that would remind you as to the substance of the conversation with Mr. Anderson?

A I don't understand. Can you repeat the question?

Q Is there anything that would remind you as to the substance of your conversation with Mr. Anderson?

A I'm not particularly sure.

Q Did you take any notes after that conversation you had with Mr. Anderson?

A No.

Q Was there any correspondence that you had with Mr. Anderson after that?

A After the meeting?

Q Yes.

A Yes.

1 ANTONNE M. JONES

2 MR. TAMOSHUNAS: I ask for the  
3 production of that correspondence.

4 MR. DUNLOP: Off the record.

5 (Whereupon, a discussion was held off  
6 the record.)

7 BY MR. TAMOSHUNAS:

8 Q Were there any letters or E-mails that  
9 you sent to Mr. Anderson after the meeting?

10 A I didn't send any letters.

11 Q What about E-mails?

12 A I can't recall at this moment.

13 Q Are there any other documents or  
14 anything else that would help you remember the  
15 substance of your conversation with  
16 Mr. Anderson?

17 A I'm not sure at this moment.

18 Q So at this moment, you can't think of  
19 anything that would help you better remember  
20 that conversation, right?

21 A At this moment, no.

22 Q What was your response to Mr. Anderson  
23 saying that he had not been compensated enough  
24 relating to State Property?

25 MR. DUNLOP: Objection as to form.

1 ANTONNE M. JONES

2 You can answer.

3 A Well, I didn't elaborate too much  
4 because I didn't know exactly what the  
5 circumstances were.

6 Q What was your response?

7 A I don't recall at the moment.

8 Q Do you recall what your -- what the  
9 substance of your response to him was?

10 A No, I don't recall at this moment.

11 Q Did you two discuss any financial  
12 dealings after that?

13 MR. DUNLOP: Objection to form.

14 A No.

15 Q Is there anything else you recall  
16 about the conversation with Mr. Anderson?

17 A Not that I can remember at this  
18 moment.

19 Q Was there anything exchanged at that  
20 meeting between you two?

21 A No.

22 Q Did you have any other contacts with  
23 Mr. Anderson?

24 A Yes.

25 Q When was that?



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A It was after our first meeting.

Q How long after?

A I would say approximately seven weeks.

Q Was that conversation over the phone  
or in in-person meeting?

A It was over the phone and in person.  
I met with him in person.

Q So it was both a phone conversation  
and a meeting?

A Yes.

Q And who initiated the phone call?

A I'm not sure exactly who called who at  
this moment. I don't recall.

Q And what was the substance of that  
call?

A Which particular call?

Q The phone conversation with  
Mr. Anderson that you had after your meeting.

A I don't recall the exact conversation  
that we had. I don't recall. I just remember  
speaking with him, but I don't recall.

Q What was the substance of your  
conversation with him?

A Well, I do remember we had--- one of

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the calls it was like a personal call regarding him just getting out of the hospital because had he had some heart troubles. He was pretty big guy and he said he had some heart trouble, and he mentioned he was going through a divorce.

Also he mentioned how we're both from pretty much the same neighborhood and didn't know each other, and we mentioned some mutual people that we knew from the neighborhood. And he actually went to high school with my cousin Mark. I mentioned Mark Jones. Real personal, you know. Talking about breakdancing, music. He was talking about when he was out on the West Coast with Will Smith and how he got sent back home. Just real personal conversation.

Q Who else did you know in common?

A Well, we knew some of the same people from the neighborhood. He knew some of the people and I knew some of the people. Like actually I know his brother, Monty G. He was a rapper.

Q What's his last name?

A I don't know his last name.

Q Who else did you know in common?